

November 14, 2012

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Dear FCC Commissioners

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This is a powerful, but ill-timed proposal.

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The public consultant firm Rolka Loube Saltzer Associates LLC (RLSA) recommendation that the FCC alter its regulations, financial and otherwise, to the current U.S. Video Relay System, is outside the original intent of the law and the intended use of taxpayers dollars, collected from the telephony industry.Â This accepted telephony industry pass-a-long tax is beneficial to US citizens and allows more consumers, specifically disabled consumers, heretofore in a status of complete communicative discrimination, to benefit from the telephony industry.

This telephony industry could turn an angry back to an FCC take-over move which would diminish the use by millions of the newly inculcated telephony consumers. Those new Video Cell phones are the hottest communicative device of tens of thousands of Deaf, Deaf/Blind and hard of hearing consumers. Their millions of non-disabled families and friends are also tax payers who might take exception to having family members decade-long Video communications being tampered with.

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What is missing in RLSA's analysis and recommendations:

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1. There are not enough Certified and Licensed Interpreters.
2. The Video Phone System is not fully researched, developed or deployed.Â

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â€¢Â The U.S. needs 30,000 Certified/Licensed Interpreters - we have under 9,500!

â€¢Â The nascent video phone (cell and non-cellular) is under-developed and under-deployed, it is not installed fully.

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I would like to clarify some important facts.

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Interpretation is the Product

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The Video Relay System, so called and mislabeled, is an INTERPRETING SERVICE.

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By highlighting this unreported fact, I do not take away any of the importance from the Video and Audio technologies that are used, along with the Internet and established phone systems, but the actual product/service is Interpretation.Â This fact it was not included in RLSA's report, at least to a

degree that would assure me, an Certified/Licensed Interpreter, that the FCC and RLSA understand the market dynamics that have been professionally developed and managed by the private companies growing the commercial venture of Interpretation over national and inter-national phone systems, including the video phone system, that has, since its discovery in the 1940's, found a profitable niche in the telephony industry.

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Video Technology is the Delivery System

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This new visual communicative system, made possible by taxing the telephony companies, is a new breed of government, private commercial cooperation in the research, development and deployment of the video phone concept, being able to see who your are talking with.Â For Deaf, Deaf/Blind and hard of hearing people who communicate with the language of American Sign Language, it is absolutely necessary.Â To others who speak their languages, it is currently a novelty, but may soon prove to be preferred and in the future a mainstream form of communication.

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Whatever it is, the complete video system is under-researched, therefore under-developed and it follows...under-deployed.Â Not all Deaf, Deaf/Blind and hard of hearing people have video phones, cell video phones or otherwise, in their homes, offices or public communication facilities.

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Finally, I amÂ convinced that your proposal will diminish or even destroy a successful commercial venture and force Deaf, Deaf/Blind and hard of hearing people to go back to Commercial Second Class Citizenship which they were forced to accept in 1876, the year Bell invented his phone, by accident, for it was ironically intended to be a hearing aid for his wife.Â

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Let us, the people order our United States Government, not to reverse the Commercial Communication success story that is the Video Relay Phone System, regulated by the FCC, and designed, developed and being deployed by private companies.

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By introduction and full disclosure, I am a nationally certified and licensed Interpreter in the states of Indiana and Connecticut.Â Sorenson Communications is my employer, where I hold the position of a full time video interpreter.Â Previously, I held the position of Executive Director of the National Association of Interpreters, known as the Registry of Interpreters for the Deaf, and the Executive Director of the Louisiana Commission on the Deaf, the state agency responsible for implementing "accessibility programs" for Deaf, Deaf/Blind, hard of hearing and speech impaired people of Louisiana, and have worked in education,Â education and rehabilitation services with Deaf, Deaf/Blind and Hard of Hearing Consumers since 1970.Â

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It has been a valuable experience working for Sorenson Communications which has developed and maintained a professional work environment for its employees, and specifically its Interpreters.Â Its

technical products, the video phone system: design, development and deployment, is second to none.Â Undisputedly, its service, Interpretation, is world class.

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I am an Interpreter, a person who was tested, certified and licensed to practice the art of interpretation, enabling two distinct language cultures to communicate and make commerce possible between them.Â That element of commerce is unique to this discussion of "video relay" and I include it in my comments for it is the fundamental reason why U.S. citizens seek equality in our interactions.Â It is no different for U.S.Â citizens who use American Sign Language (ASL); they too wish to participate fully in American and international commerce.

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To that end the question is: Who is best able to develop and deliver on the promise of equal and efficient communication?Â I believe it is private industry.Â

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For those who think otherwise, do you also suggest or imply that government should take over and manage Verizon, Sprint, AT&T's communications business?

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Video Relay Service is certainly bound to technological developments of the telephony industry and its tax to support VRS, as it grows to include combining all three forms of data transference: visual, voice and data.Â And interpretation and interpreters and the commercial and personal benefits to Americans is being embraced by many, but not all.Â Sorenson and all VRS companies must complete the development and deployment of the video phone system to 100% of the people it is intended to serve.Â Why have I not seen any comments from the government or its consultant discussing this along with information on the lack of Certified and Licensed Interpreters?

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Government and its consultants should look out for the Constitutional interests of the people of the United States, and not attempt to move into actual research, development and deployment of product and services.Â Government best serves when government is small and is least intrusive.Â

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Private companies best serve in matters of commerce for they have to maintain the quality of products and the quality of services because the educated consumer demands it or those companies falter and go out of business.

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Now I cannot honestly tell anyone what the other VRS companies have or have not achieved, since the inception of VRS products and services began with the support of the government/telephony tax payment system. But I can personally attest to the fact that Sorenson Communications has lead the nation and the world in the successful development and deployment of both its service, Interpretation, and its product, Video Phone System (the first successful video phone system of its kind since Bell Labs initial development of a video phone system in the '40s).Â

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Those two facts, Interpretation and Video Technology/Internet, along with its national and now international track record of success, gives me pause to tell all, we should leave well enough alone.Â

Note:Â

1.Â The "profession" of Interpretation is young, and with that comes certain volatile facts.Â We have little or no theory, research and linked practices clarifying what it is we do, allowing us to duplicate our best practitioners.Â Only recently has a PhD program in the U.S. initiated a program of study, that will bring needed theory and research to the practice of interpretation.

2.Â This volatile state of development in Interpretation can hardly be served by under-paid Interpreters and students in High School thinking about various professions, who are considering future wages critical in their decision making.Â Reducing incomes of Interpreters, already woefully under paid, will decrease the number of Interpreters who are needed to perform Interpretation, specifically in the best venue for Interpretation, which is the fledgling Video Relay Service Industry.

3.Â The United States needs 30,000 Nationally Certified and Licensed Interpreters just to provide one hour of interpreting each week to each Deaf, Deaf/Blind and Hard of Hearing person.Â Any market flux that changes the dynamic of why students enter this new and developing profession of Interpretation will cause a reduction of students at the Masters level and reduce further practitioners who are both Certified and Licensed to practice state by state.

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In conclusion, the U.S. government should continue with the current system of regulating the new video relay service system, allowing private companies to continue their Research, Development and Deployment of the current VRS system until we hit 100% market saturation for both work and home.

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Certified and Licensed Interpreters must be deliberately recognized and included in the delivery of this service in order to meet the Americans with Disability Act, the Federal mandate to insure equal rights to communication and commerce for all Americans."

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Respectfully submitted by,

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